Chief Judge Richardo S. Martinez 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 BENJAMIN RIEDESEL Case No. 2:21-cv-00033-RSM 10 Plaintiff, STIPULATED MOTION AND ORDER FOR EXTENSION OF PRETRIAL 11 v. **DEADLINES** UNITED STATES OF AMERICA, 12 **Noted on Motion Calendar:** Defendant. 13 October 18, 2021 14 15 **JOINT STIPULATION** 16 The parties hereby jointly STIPULATE AND AGREE to extend the following pretrial 17 deadlines as set forth in the Court's June 7, 2021, Order Setting Trial Date and Related Dates 18 (Dkt. 12), as set forth below. 19 **Current Deadline Deadline Proposed New Deadline** 20 All motions related to November 12, 2021 December 3, 2021 discovery must be FILED by 21 Discovery completed by December 13, 2021 December 27, 2021 22

STIPULATED MOTION AND ORDER FOR EXTENSION OF PRETRIAL DEADLINES [2:21-cv-00033-RSM] - 1

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UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970 Good cause exists for extending this deadline. On October 13, 2021, the parties disclosed their respective expert witnesses. At least one expert witness is unavailable to be deposed prior to the current motion cut-off date of November 12, 2021. Although the parties will work to resolve any issues pertaining to expert discovery informally, to the extent issues arise during the course of deposition(s) that necessitate the filing of motions to compel or other motions relating to expert discovery (e.g., not motions *in limine*), the parties will require an extension of the current deadline. The parties have been diligent with respect to both fact and expert discovery to date and the extension is sought merely to accommodate the schedule of at least one expert witness, whose deposition is presently set for November 22, 2021. Extension of the deadline referenced above will not impact the remaining deadlines set forth in the Court's Order. These remaining dates are listed below for the Court's convenience.

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<u>Deadline</u>	Current Deadline	Proposed New Deadline
All dispositive motions must be filed by	January 11, 2022	N/A
All motions <i>in limine</i> must be filed by	March 14, 2022	N/A
Agreed pretrial order due	March 30, 2022	N/A
Trial briefs, proposed findings of fact and conclusions of law, etc. due	April 6, 2022	N/A

For the reasons set forth above, the parties believe that there is good cause to request an extension of the above-listed pretrial deadline and respectfully request that the Court grant their motion.

1	SO STIPULATED.	
2	Dated this 15th day of October, 2021.	
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4	COLBURN LAW	
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10		
11	SO STIPULATED.	
12	Dated this 15th day of October, 2021.	
13	NICOLAS W. BROWN	
14	United States Attorney	
15	s/ Erin K. Hoar ERIN K. HOAR, CA No. 311332	
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20	Attorneys for Defendant United States of America	
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1	<u>ORDER</u>
2	IT IS SO ORDERED.
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4	DATED this 19 th day of October, 2021.
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7	RICARDO S. MARTINEZ
8	CHIEF UNITED STATES DISTRICT JUDGE
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